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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

DONALD R. CAMERON, et al.,

Plaintiffs,

v.

APPLE INC.

Defendant.

No. 4:19-cv-03074-YGR

STIPULATION AND [PROPOSED] ORDER

[Civil L.R. 6-2]

Hon. Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Donald R. Cameron and Pure Sweat Basketball,  
2 Inc. (“Developer Plaintiffs”) and Defendant Apple Inc. (“Apple”) (collectively, the “Parties”), by and  
3 through their respective counsel, hereby agree as follows:

4 WHEREAS, on June 10, 2022, the Court entered an Order granting final approval of  
5 Developer Plaintiffs’ class action settlement with Apple (ECF No. 491);

6 WHEREAS, on July 15, 2022, the Court entered an Amended Judgement of Dismissal with  
7 Prejudice as to Apple (“Amended Judgment”) (ECF No. 494);

8 WHEREAS, the Amended Judgement provides that the Parties shall file “a post-distribution  
9 accounting in accordance with this District’s Procedural Guidance for Class Action Settlements no  
10 later than October 28, 2022” and sets “a compliance deadline on October 21, 2022 on the Court’s  
11 9:01 a.m. calendar to verify timely filing of the post-distribution accounting” (ECF No. 494);

12 WHEREAS, on September 14, 2022, and pursuant to the procedures set forth in the  
13 Settlement Agreement, the parties mutually accepted the Settlement Administrator’s  
14 recommendation for resolving all contested settlement claims;

15 WHEREAS, in accordance with the Settlement Agreement, Apple distributed the Settlement  
16 Fund to the Settlement Administrator by October 14, 2022;

17 WHEREAS, the Settlement Administrator anticipates that distributions to Settlement Class  
18 Members will begin on or around October 26, 2022, with uncashed checks becoming void (“stale”) on or around June 1, 2023;

19 WHEREAS, this District’s Procedural Guidance for Class Action Settlements provides that a  
20 Post-Distribution Accounting be filed “[w]ithin 21 days after the settlement checks become stale,”  
21 such that, despite the Parties’ diligent efforts, a Post-Distribution Accounting cannot be submitted in  
22 accordance with the Procedural Guidance by the operative October 28, 2022 submission deadline;

23 THEREFORE, IT IS STIPULATED AND AGREED that the deadline for the parties to  
24 submit a post-distribution accounting be extended until July 7, 2023.

25 IT IS FURTHER HEREBY STIPULATED AND AGREED that the compliance deadline to  
26 verify timely filing of the post-distribution accounting be extended to the Court’s 9:01 a.m. calendar  
27 on June 30, 2023.

28 **IT IS SO STIPULATED**

1 DATED: October 18, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP  
Steve W. Bermam

3 By: /s/ Steve W. Bermam

4 *Attorneys for Plaintiffs Donald R. Cameron and Pure*  
5 *Sweat Basketball, Inc.*

6 DATED: October 18, 2022

GIBSON, DUNN & CRUTCHER LLP  
Caeli A. Higney

7 By: /s/ Caeli A. Higney

8 *Attorneys for Defendant Apple Inc.*

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10 \* \* \*

11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12  
13 DATED: \_\_\_\_\_

\_\_\_\_\_  
14 THE HONORABLE YVONNE GONZALEZ ROGERS  
15 UNITED STATES DISTRICT COURT JUDGE  
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**E-FILING ATTESTATION**

I, Steve W. Berman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Steve W. Berman  
STEVE W. BERMAN